IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE:	
HEANA DELCADO ADONTE	CASE NO. 21-02591/MCF
ILEANA DELGADO APONTE	CHAPTER 13
DEBTOR	Ţ.

DEBTOR'S MOTION REQUESTING ORDER RE: AUTHORIZATION TO USE FUNDS FROM GOVERNMENT SPECIAL BONUS

TO THE HONORABLE COURT:

NOW COMES, ILEANA DELGADO APONTE, the Debtor, through the undersigned attorney, and very respectfully states and prays as follows:

- 1. On August 30, 2021, the Debtor filed for protection under Chapter 13 of the Bankruptcy Code, 11 U.S.C. §§1301 et seq.
- 2. The Debtor has been employed for the last 19 years as an office worker with the "Centro Cardiovascular de Puerto Rico y El Caribe".
- 3. On November 16, 2022 the Debtor received the proceeds from a Puerto Rico Government "special bonus" in the total amount of \$2,728.02. Attached is copy of pay-stub received by the Debtor as evidence of having received said bonus.
- 4. The Debtor respectfully submits to the Court that she needs to use these funds from the "special bonus" to pay for the following "reasonable and necessary" expense: purchase of a new dryer appliance (actual dryer is broken), a dining room set expenses and car mechanic repairs. Attached is copy of estimates/invoices for said expenses.
- 5. The Debtor will pay to the Trustee the unused portion or balance from said bonus in the sum of \$88.71, to fund the confirmed Plan.

- 6. It is to be noted that the above stated extraordinary expenses are not considered in Debtor's scheduled budget. See: Schedules I & J, Docket No. 1.
- 7. The Debtor needs to use the funds from the Puerto Rico Government "special bonus" proceeds to pay for these "reasonable and necessary" expenses. Furthermore, the Debtor is living within a very "tight" budget which barely covers his living expenses and a confirmed Plan payment of \$171.00.
- 8. Based on the above stated, the Debtor respectfully requests this Court to Order the authorization of the use of these funds to allow the Debtor to pay for the above mentioned "necessary and reasonable" expenses.

WHEREFORE, the Debtor, through the undersigned attorney respectfully request that this Honorable Court grant the foregoing motion and allow the use of the funds from the Puerto Rico Government "special bonus" proceeds to pay for the above stated expenses, in the above captioned case.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to Debtor to her address of record.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 10th day of January 2023.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY for the DEBTOR
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699/787-963-7699
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Estado Libre Asociado de Puerto Rico CENTRO CARDIOVASCULAR DE PUERTO RICO Y DEL CARIBE Dr. Ramón M. Suárez Calderón

Somos Todo Corazón

PO Box 366528 | San Juan, PR | 00936-6528

DELGADO APONTE, ILEANA

Dept: 2232

HC-01 BOX 8470 GURABO, PR 007780000

Emp#: 01666

Job#: 1

Pay Ending Date: 11/16/2022 Deposit Date: 11/25/2022

TIMESHEETS	Hours	Rate	Amount
Bonus	0.00	0.00	2,954.00
	0.00	12	2,954.00
EARNINGS	100	Current	Y-T-D
-24 \$		0.00	252.80
Bonus		2,954.00	4,054.00
Christmas Bonus		0.00	600.00
Enfermedad (Authorized Sick) \$		0.00	991.40
Feriado (Holiday) \$		0.00	1,219.42
Feriado (Holiday) Worked Earnings		0.00	674.15
Incentivo Turno (Shift)		0.00	1,908.00
Proclama (Natural Emerg) \$		0.00	23.13
Salario Horas (Reg) \$		0.00	18,638.12
Sicktom (Sick Personal) \$		0.00	588.23
TRegVacaciones (Late to Work) \$		0.00	19.82
Vacaciones (vac taken) \$		0.00	495.70
Vacaciones Tomadas (Personal) \$		0.00	1,070.70
DEDUCTIONS		Current	Y-T-D
AEELA		0.00	709.89
Dental Employee Deduction		0.00	,200.68
Employee Retiro Hibrido		0.00	2,011.53
Health Employee Deduction		0.00	224.96
Medicare Employee Deduction		42.83	434.11
Prest. Personal-Retiro		0.00	111.22
Puerto Rico Tax		0.00	547.36
Seguro Incapacidad Retiro		0.00	59.18
Social Security Employee Deduction		183.15	1,856.02
Union General		0.00	192.00
Union General		225.98	6,346.95
ACCRUALS		Current	Y-T-D
Secretary and the secretary an		0.00	212.45
Sick Bank - Hours Balance		0.00	14.36
Vacation Bank - Net Days Balance		0.00	107.69
Vacation Bank - Net Hours Balance	alto e Kalil	er die Statisch	VID
TOTALS		Current	Y-T-D
Conse Pay		2,954.00	30,535.47
Gross Pay Net Earnings		2,728.02	24,188.52



Luis Villanueva

NIF/CIF MECANICA HYDRAULICO, FUEL INJECTION, DIESEL, MONTA CARGAS, ENTRE OTROS
HC01box 8476 Gurabo PR 00778
Carr 181 Km 15.9 Sec Los Aponte Bo Santa Rita Gurabo PR 00778
9392582033
luis14075@gmail.com

PRESUPUESTO COTISACION0006

FECHA 01/09/2023

TOTAL USD 1541,17 \$

CLIENTE

Ileana Delgado Aponte

Vehiculo: TOYOTA COROLLA "01

Motor: 1.8(MFI) Tabl: EEH 329 1 787-618-7717

ARTÍCULO	TARIFA	CANT.	IMPUESTO	TOTAL
Rack pinions	175,00 \$	1	19,25 \$ 11%	175,00 \$
Terminal afuera izq	22,98\$	1	2,53 \$ 11%	22,98 \$
Terminal afuera der	24,97 \$	1	2,75 \$ 11%	24,97 \$
Amortiguadores delanteros	78,00 \$	2	17,16 \$ 11%	156,00 \$
Base de amortiguador	32,99 \$	1	3,63 \$ 11%	32,99 \$
Goma de amortiguador centrar	12,00\$	4	5,28 \$ 11%	48,00 \$
Link kit	18,00\$	2	3,96 \$ 11%	36,00 \$
Bushing de barra estb	12,00\$	1	1,32 \$ 11%	12,00 \$
Sportes de motor	225,00 \$	1	24,75 \$ 11%	225,00 \$

ARTÍCULO	TARIFA	CANT.	IMPUESTO	TOTAL
Caja bolas del	45,00 \$	2	9,90 \$ 11%	90,00 \$
Buje delanteros	35,00 \$	2	7,70 \$ 11%	70,00 \$
Labor	550,00 \$	1		550,00 \$*
* Indica que el producto no es imponible	TOTAL PARCIAL IMPUESTO			1442,94 \$ 98,23 \$
	TOTAL		USD	1541,17 \$

Cp "rasquillo Discount, Inc. Calle ANGEL C MORALES, NUM. 4 APARTADO 826 · GURABO, PR. 60774 TEL. (787) 737-3731 Factura No. 91417
VENDIOO Floans Delay ENVIDO A (287) 212-1740 SOLO TO Floans Delay ENVIDO A (287) 205-4959 Po Ata Puta Sulta Epite
CANTIDAD MARROY O DECIMENCANIA UNIT DAG AMOUNT
Secadoro gus \$539 W
M-FCGR 4/20 SW \$ 600,99
latio gavanties piego greenini
5 ans garentei
ACCEPTACIÓN DE COMPRA A RECEIDO CONFORME
FISMA DEL COMPRADOR LA MERCANCIA VIALA POR CUENTA Y RESISTO DE COMPRADOR, SIRVASE NO DEVOLVERNOS MERCANCIA SIR NUESTRO PERMISO. NO SE ACRIPTAN SE CLAMACIONES SOBRE FACTURA PASADOS LOS (8) CONO DAS DESPLÉS DE LA MISMA.

S. Carlon